

deposition. (See Email from Thomas Clare to Palma Pustilnik (April 24, 2015 10:42 AM EDT) (“April 2015 Proposal”) (Attached hereto as Ex. A)).

3. Jackie and her lawyers rejected the April 2015 Proposal in its entirety.

4. Having rejected Dean Eramo’s April 2015 Proposal and other similar efforts by Dean Eramo to limit Jackie’s direct participation in these proceedings, ***Jackie and her attorneys are solely responsible for the current need to depose Jackie*** – not Dean Eramo. Similarly, by submitting a declaration from Jackie’s psychologist to the Court and by purposefully making an issue of Jackie’s mental health and competency as a witness (something Dean Eramo has not done) ***Jackie and her lawyers are entirely responsible for the need to depose her psychologist.***

5. Jackie and her lawyers should not be permitted to abuse public court filings — and mislead the Court and the public — with gratuitous, irrelevant, and demonstrably false personal attacks on Dean Eramo’s character and her motives regarding the need for these depositions.

WHEREFORE, Plaintiff Nicole Eramo requests that the Court enter an appropriate order that all personal attacks on Dean Eramo be struck from Respondents’ recent court filings.

Dated: March 29, 2016

Respectfully submitted,

By: /s/ Thomas A. Clare

Thomas A. Clare (VA Bar No. 39299)

Elizabeth M. Locke (VA Bar No. 71784)

Andrew C. Phillips (VA Bar No. 88880)

CLARE LOCKE LLP

902 Prince Street

Alexandria, Virginia 22314

Telephone: (202) 628-7400

tom@clarelocke.com

libby@clarelocke.com

andy@clarelocke.com

ATTORNEYS FOR PLAINTIFF NICOLE ERAMO

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Nicole Eramo's Motion to Strike Non-Party Respondent "Jackie's" Personal Attacks on Plaintiff in her Court Filings on March 29, 2016 via ECF (for those attorneys that have registered), or by email and Federal Express (for those attorneys that have not).

Pat A. Cipollone
Rebecca R. Anzidei
Philip J. O'Beirne
Stein Mitchell Cipollone Beato & Missner LLP
1100 Connecticut Avenue N.W., Suite 1100
Washington, D.C. 20036
Telephone: (202) 737-7777
Fax: (202) 296-8312
Email: pcipollone@steinmitchell.com
Email: pobeirne@steinmitchell.com
Email: ranzidei@steinmitchell.com

Palma Pustilnik
Staff Attorney
Central Virginia Legal Aid Society
1000 Preston Avenue, Suite B
Charlottesville, VA 22903
Telephone: (434) 327-1443
Fax: (434) 296-5731
Email: palma@cvas.org

Attorneys for Non-Party Respondent "Jackie"

Michael John Finney
William David Paxton
Gentry Locke Rakes & Moore
P.O. Box 40013
Roanoke, VA 24022-0013
Telephone: (540) 983-9373
Telephone: (540) 983-9334
Fax: (540) 983-9400
Email: finney@gentrylocke.com
Email: paxton@gentrylocke.com

Elizabeth A. McNamara
Samuel M. Bayard

DAVIS WRIGHT TREMAINE LLP
1251 Avenue of the Americas
21st Floor
New York, New York 10020
Telephone: (212) 489-8230
Fax: (212) 489-8340
Email: lizmcnamara@dwt.com
Email: samuelbayard@dwt.com

Alison B. Schary
DAVIS WRIGHT TREMAINE LLP
1919 Pennsylvania Avenue NW, Suite 800
Washington, DC 20006-3401
Telephone: (202) 973-4248 Fax: (202) 973-4448
E-mail: alisonschary@dwt.com

*Attorneys for Defendants Rolling Stone LLC,
Sabrina Rubin Erdely, and Wenner Media LLC*

Dated: March 29, 2016

By: /s/ Thomas A. Clare
Thomas A. Clare